

EXHIBIT 1

**More Definite Statement as to
Defendant Yusuf Al-Qardawi**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849.

2. Defendant Yusuf Al-Qardawi is one of the most prominent clerics in the Muslim Brotherhood, a shareholder of and spiritual advisor to Defendant and Specially Designated Global Terrorist (SDGT) Bank Al-Taqwa in the Bahamas and Defendant Daar al Maal al Islami Trust. Al-Qardawi has been barred from entering the United States since November of 1999 as a result of his support of Al-Qaeda; as he has openly and consistently provided religious justification for acts of terrorism—including suicide bombings in Israel and Iraq.

3. Al Qardawi established and leads the Department of Islamic Law and the Institute for Sunnah Research at the University of Qatar. Al-Qardawi has also held positions on the International Council of Muslim Clerics, the European Council for Fatwa and Research and is the former director of the Islamic Center of Boston.

4. Authorities in Switzerland have a video cassette showing Al-Qardawi in Afghanistan, in March of 1993, in close proximity to Al Qaeda training camps and participating in the making of speeches calling for the use of violence against the United States.

5. Al-Qardawi is one of the driving figures behind the spread of Bin Laden's toxic ideology. Al-Qardawi is a highly influential Islamic extremist whose Fatwa(s) have publicly advocated the use of violence against the United States and Israel, praised

suicide bombers and urged Muslims to commit acts of terrorism in fulfillment of their religious duty. Indeed, since September 11, 2001, Al-Qardawi has been a regular guest on Al-Jazeera and Abu Dhabi satellite channels.

6. On May 12, 2001, Qardawi stated that:

“The suicide mission is the loftiest form of jihad. We are talking about a heroic act of sacrifice and sanctification. The person who redeems his soul for Allah, Sacrifices himself as a sacrifice for religion and people, and fights the enemies of Allah, with new weapons that fate awarded to the downtrodden, in order to fight with these means against the tyranny of the arrogant.”

7. Additionally, in an interview in the *Palestine Times*, Qardawi stated:

“The foreign military presence in the Arab world is in fact a new imperialist invasion. The Islamic resistance in Lebanon and Palestine represents the glorious face of the Muslim Umma and serves as an example to that effect...I have issued a religious edict blessing the martyrdom operations in which a given Muslim fighter turns himself or herself into a human bomb that casts terror into the hearts of the enemy.”

8. On April 25, 2001, Al-Qardawi told the Associated Press that—“a suicide bombing is an act of martyrdom, not an act of suicide...It is one of the greatest means of struggle.”

9. On December 9, 2001, while on an Al-Jazeera broadcast, Al Qardawi stated that—“suicide operations is an unjust and misleading name because these are heroic commando and martyrdom attacks and should not be called suicide operations.”

10. On January 29, 2003, Al-Qardawi was quoted in the *Gulf Times* as saying—“Those killed fighting the American forces are martyrs given their good intentions since they consider these invading troops as an enemy within their territories but without their will.”

11. On January 19, 2004, Al-Qardawi commended “those men and women who are willing to give up their lives in order to plant terror in the hearts of those who have terrorized them, oppressed them, and left them no other way to defend themselves.”

12. Al-Qardawi has even encouraged Muslims to attack American troops and civilians in Iraq. In August 2004, Al-Qardawi issued a fatwa saying:

“All Americans in Iraq are soldiers, there is no difference between enlisted soldiers and civilians, and they must be fought because American citizens came to Iraq to serve the occupation. The kidnapping and killing of Americans in Iraq is a Muslim religious obligation to force them to leave the country immediately.”

13. Al-Qardawi’s contributions to Al-Qaeda are not limited only to the ideological realm. Rather, Al-Qardawi holds prominent positions in several banks that have been red flagged by the U.S. government for their financial ties to Al-Qaeda.

14. Al-Qardawi is a member of the Al Taqwa Bank’s religious board. Therefore, he is not only responsible for providing spiritual advice and guidance to the bank but he

also makes decisions regarding the distribution of the bank's zakat (donations to charities).

15. Al-Taqwa Bank served as a primary source of funding for Al-Qaeda and Osama Bin Laden.

16. On November 7, 2001, Al-Taqwa Bank was designated as an SDGT by President Bush. According to Italy's Division of General Intelligence and Special Operations, Al-Taqwa handled financing for a number of Arab and Islamic political and militant groups, including former Afghan mujahedin in Bin Laden's camps, the Palestine Liberation Organization, Hamas, the Algerian Armed Islamic Group and the Egyptian Gama'a al-Islamiya.

17. Testifying before Congress in February, Juan Zarate of the Department of the Treasury told lawmakers that U.S. intelligence agencies had evidence that al-Qaeda operatives received financial assistance from Al-Taqwa's chairman as recently as late September 2001—after the 9/11 attacks.

18. George B. Wolfe, the Deputy General Counsel of the United States Department of Treasury, sent a letter to prosecutors in Switzerland that claimed the following:

“As of October 2000, Bank Al Taqwa appeared to be providing a clandestine line of credit for a close associate of Usama Bin Laden. This bin Laden lieutenant had a line of credit with a Middle East financial institution that drew on an identical account number as Al Taqwa. Unlike other accounts—even accounts of private banking customers—this account was blocked by the computer

system and special privileges were required to access it. No identifiable names were associated with the account. These circumstances are highly unusual, and may have been done to conceal the association of the bin Laden organization with Bank Al Taqwa.”

19. Al-Taqwa Bank has an account for Mamdouh Mahmoud Salim, an al-Qaeda operative who is in U.S. custody for his role in the 1998 Embassy bombings. U.S. investigators believe that the account has been used to finance terrorist activity.

20. According to an article in Newsweek, Al-Taqwa’s Bahamian banking license allowed Al Taqwa officers to—“open commercial correspondent accounts with established European banks—paying the larger institutions fees to make cash transfers around the world for them, without calling attention to themselves.” According to counterterrorism experts and government officials, such convoluted banking practices are a red flag for money laundering and terrorist financing.

21. Defendants and Specially Designated Global Terrorists Yusuf Nada and Ahmend Nasreddin, two other owners of Al-Taqwa Bank, have used the bank in combination with their other business endeavors as well as their own personal wealth to finance the Islamic Cultural Institute of Milan (ICI). Authorities believe that the ICI is Al-Qaeda’s central recruiting and coordinating center in Europe. The U.S. Treasury Department issued a press release claiming that the center is used to—“facilitate the movement of weapons, men and money across the world.” According to the U.S. investigation into the 1998 attacks on the American Embassies in Kenya and Tanzania, the Milan center was also a recruiting cite for an al-Qaeda training camp in Afghanistan.

The ICI is located in Italy, just across the border from Lugano, Switzerland at Viale Jenner n 50, 20159.

22. Ahmed Nasreddin played a central role in the ICI's founding in 1988 and has financially supported the center through charitable donations that were used for rent and utility expenses. He has also served as a board member for ICI. Nasreddin's lawyer, P.F. Barchi, has admitted that Nasreddin was warned by Egyptian Secret Service about potential terrorist "problems" with the center. According to Italian Prosecutor Stefano Dambruoso, Al Taqwa Bank was until recently paying \$25,000 a year in rent of the Islamic Cultural Center in Milan.

23. In June of 1998, Italian intelligence investigated Islamic militants who had gone to Afghanistan and Pakistan to take training courses and were sent to fight "jihad" in Bosnia. The authorities learned that the leader of a Vienna, Austria mosque, Mahmoud Sami, sent a fax (NFI) to the ICI. From the fax, the Italian Police learned that the International Islamic Front and Osama Bin Laden's terrorist network had issued death sentences against American citizens. This communication illustrates the central role of the ICI in al-Qaeda's operational structure as well as the existing contacts between the ICI and other fundamentalist groups in Europe.

24. Relations between the ICI and Al-Taqwa Bank also include Sante Abdulawahab Ciccarello, a board member that co-founded the branch of Al Taqwa Bank in the Bahamas.

25. Al-Taqwa Bank has also provided financial assistance to the Islamic Center of Geneva. Established by in 1961 by Said Ramadan, the founder of the co-defendant the Muslim World League, the Islamic Center provided a support network for Al Qaeda's

terrorist activities. In 1991, the son of the Islamic Center's founder organized a conference at which Ayman al-Zawahiri and Omar Abdel Rahman, indicted for his role in the 1993 World Trade Center bombing, were present.

26. Moreover, Islamic convert and Nazi sympathizer Albert Huber acknowledged that he used his connections to the Center to meet with members of Osama Bin Laden's al-Qaeda network in Lebanon. Huber also serves on the board of Al Taqwa and has described September 11th as—"counter terrorism against American-Israel terror."

27. Al-Qardawi is also a board member and spiritual adviser to Defendant DMI Administrative Services. DMI has laundered money for al Qaeda, knowingly and intentionally provided financial services to al Qaeda (including maintaining and servicing al Qaeda bank accounts and accounts used to fund and support al Qaeda), and/or facilitated weapons and military equipment purchases and money transfers for al Qaeda.

28. Al Taqwa Bank and DMI are one of the financial legs supporting Osama Bin Laden's Al-Qaeda network. As a spiritual adviser and shareholder of the banks, Al-Qardawi had considerable influence over the bank. Given his extremist beliefs and Al-Taqwa Bank's overt ties to the ICI and the Islamic Center of Geneva as well as its other ties to Al-Qaeda, it is clear that Al-Qardawi has provided financial, along with ideological, support to Osama Bin Laden and Al-Qaeda.